	POLICY	
Whistleblower Policy	Business Unit:	Compliance
	Document No.:	POL-COM-003
	Version No.:	1.0
	Effective Date:	21-Dec-2022

PURPOSE AND SCOPE

This policy supports Code of Conduct (POL-COM-004) and describes:

- the process for a Whistleblower to make disclosures of Reportable Conduct,
- the protections available for a Whistleblower, and,
- how Novotech will manage any disclosures of reportable conduct in a confidential and secure manner.

Novotech encourage any Whistleblower to report upon reasonable suspicion of a Reportable Conduct by Novotech’s employees, directors or third parties acting on behalf of Novotech in accordance with this policy.

APPLICABLE GROUP

All personnel.

GENERAL INFORMATION

None.

POLICY

1. DISCLOSURES

Any disclosures of a Reportable Conduct should be made to the Authorised Recipient or through an independent whistleblowing service at www.whistleblowing.com.au/novotech (links are included on the Company intranet).

If you’re unsure how to make a disclosure, you may consult the Authorised Recipient. However, if the Reportable Conduct relates to the Authorised Recipient, you should consult www.whistleblowing.com.au/novotech.

All disclosure of Reportable Conduct should, to the extent possible, be in writing and include specific, accurate, relevant information and people in relation to the Reportable Conduct.

The Whistleblower may choose to report on an anonymous basis and maintain that anonymity during and after completion of an investigation. However, if the Whistleblower reports anonymously, a means of contact (such as an anonymous email address) should be provided.

Disclosures of the Reportable Conduct should be kept confidential by the Whistleblower and Novotech will make every effort to protect the confidentiality of the report and the Whistleblower. Neither the identity of the Whistleblower, nor the information provided by the Whistleblower will be disclosed without their consent, except to lawful relevant authorities (if necessary), or to a legal practitioner for the purpose

of obtaining legal advice or legal representation or to any other person or body prescribed by relevant legislation where the safety of the Whistleblower will be guaranteed, and the Whistleblower will be informed at the earliest opportunity.

2. PROTECTIONS

Novotech strictly prohibits any form of retaliation or detrimental conduct against a Whistleblower or others who may be involved in a disclosure or investigation and will take necessary action upon detrimental conduct is identified.

3. INVESTIGATION

All information made by a Whistleblower will be initially assessed as to whether it qualifies under this policy and whether a formal and in-depth investigation is required.

Disclosures of Reportable Conduct to the Authorised Recipient at Novotech will be initially assessed by the Chief Legal and Compliance Officer (CLCO). Disclosures of Reportable Conduct to the whistleblowing service will be initially assessed by the whistleblowing service with the consultation of CLCO (where appropriate).

Any Reportable Conduct involving a member of the Executive Committee, or a director of the company will be investigated by the whistleblowing service and all other Reportable Conduct will be investigated by the CLCO and any other authorised representative unless the CLCO determines that the reportable conduct should be investigated by the whistleblowing service due to the nature of the information disclosed (such as alleged illegal activity).

The investigator will:

- act impartially,
- conduct and document all interviews required to investigate the disclosure; and,
- provide a written report on the results of the investigation and provide any recommendations to the company's CEO and board (as required).

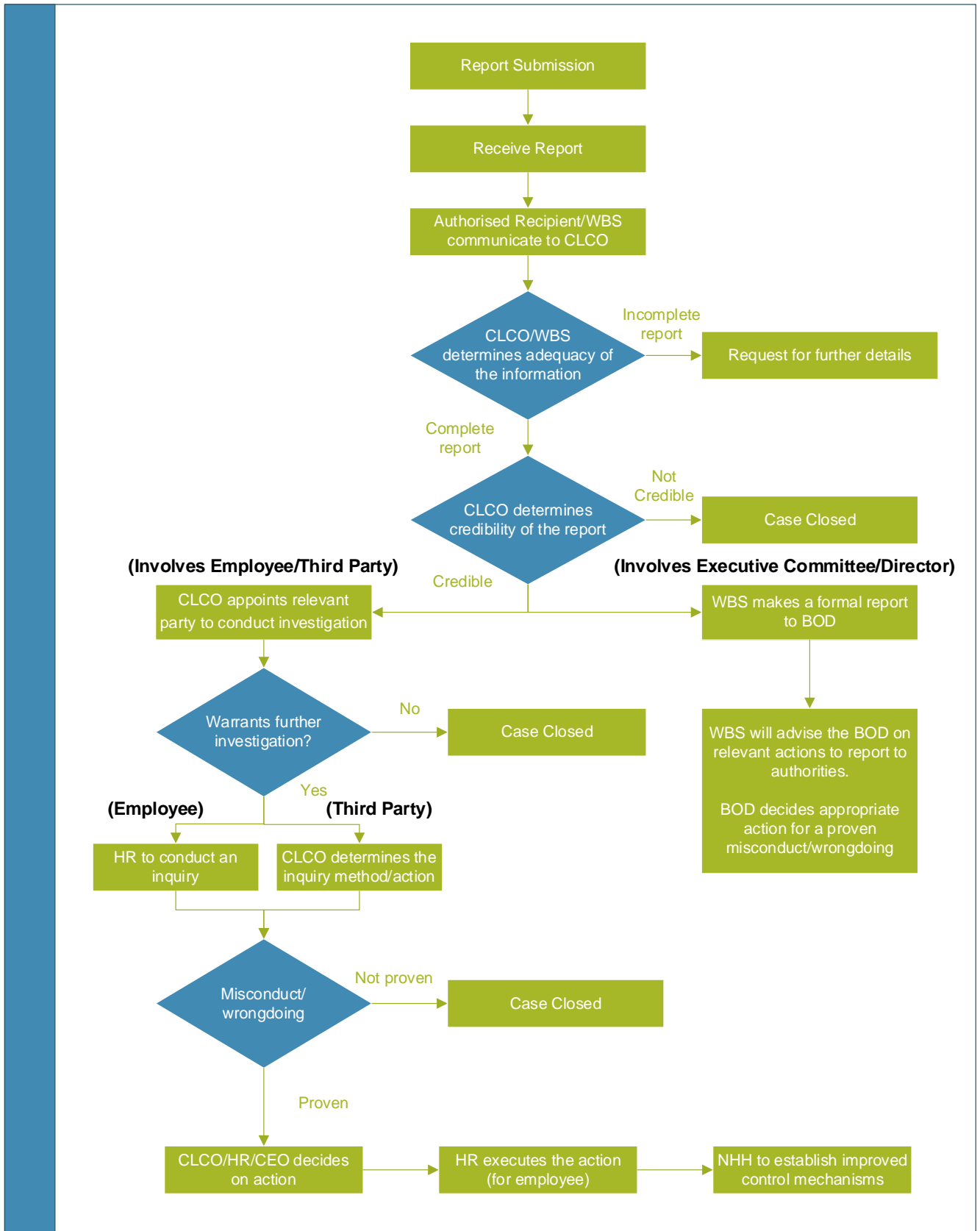
Whistleblower will be informed about the progress and outcomes of the investigation.

4. MONITORING AND REVIEW

The CLCO and/or their delegate will perform a periodical audit on the compliance of this policy.

The audit committee of the company will review this policy regularly and ensure that proper arrangements, such as this policy, are in place for fair and independent investigations of these matters and for appropriate follow-up actions.

PROCESS WORKFLOW



RELATED DOCUMENTS

- [HPR03](#) [Grievance Policy](#)
- [HPR04](#) [Performance Policy](#)
- [POL-COM-004](#) [Code of Conduct](#)

DEFINITIONS

- **Detrimental Conduct:** any actual or threatened conduct which could cause a detriment to the Whistleblower as a result of the Whistleblower disclosing Reportable Conduct, such as:
 - termination of employment,
 - harassment, bullying or intimidation,
 - personal or financial disadvantage,
 - unlawful discrimination,
 - harm or injury, including psychological harm,
 - damage to reputation; or,
 - any other conduct that constitutes retaliation or victimisation.
- **Authorised Recipient:** a person who is authorised to manage disclosures from Whistleblower at the Company. Please check with Chief Legal and Compliance Officer prior to making any disclosure.
- **Reportable Conduct:** information that the Whistleblower has reasonable grounds to suspect concerns conduct which:
 - is dishonest, fraudulent or corrupt, including bribery,
 - is illegal (such as theft, violence, harassment or intimidation, criminal damage to property or other breaches of law),
 - is unethical or in breach of Company policies (such as dishonestly altering records or data or wilfully breaching Company Code of Conduct (POL-COM-004) or other policies),
 - is potentially damaging to the Company employees or a third party, including in relation to health and safety, environment, property or resources,
 - is an abuse of authority,
 - may cause financial loss to the Company,
 - may damage the Company's reputation or be otherwise detrimental to our interests,
 - involves harassment, discrimination, victimisation or bullying (other than personal work-related grievances); or,
 - involves any other kind of misconduct that is not covered under grievances.
- Reportable conduct does not include matters such as personal work-related grievances, for which there are existing policies and processes in place available at Grievance Policy (HPR03) and Performance Policy (HPR04).
- **Whistleblower** includes but not limited to:
 - an employee (current or former) of the Company,
 - an independent contractor to the Company,

- an officer (such as a director) of the Company,
- a vendor of goods or services to the Company (including their employees),
- an associate of the Company,
- a customer of the Company,
- a relative, spouse or dependant of any of the above.

REFERENCES

None.

REVIEW AND APPROVAL

Role	Title	Signature and Date
Author	Compliance Counsel	<i>Fatihah Shafie</i> Electronically signed by: Fatihah Shafie Reason: I am the Author Date: Nov 15, 2022 11:48 GMT+8
Approver	Chief Legal and Compliance Officer	<i>V-J-HW</i> Electronically signed by: Veronica Holloway Reason: I approve Date: Nov 16, 2022 11:16 GMT+8
Reviewer	Associate Director Legal	<i>Banusri Subramaniam</i> Electronically signed by: Banu Subramaniam Reason: I have reviewed Date: Nov 16, 2022 11:38 GMT+8
QA Reviewer	Senior Director Quality Assurance	<i>Kim Wong</i> Electronically signed by: Kim Wong Reason: I have reviewed Date: Nov 16, 2022 22:12 GMT+11

REVISION HISTORY

Version	Effective Date	Reason for Revision
1.0	21-Dec-2022	Integrated Novotech Policy.

APPENDIX

None.

The information in this document is confidential and proprietary to Novotech Health Holdings. The information may only be used by the entities to which it was disclosed for the purpose it was disclosed. To the maximum extent permissible by law, the information must not be disclosed to any third parties without the prior written consent of Novotech Health Holdings.











POL-COM-003_V1.0 Whistleblower Policy

Final Audit Report

2022-11-16

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By:	Gabrielle Muhammad (Gabrielle.Muhammad@novotech-cro.com)
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-  Document created by Gabrielle Muhammad (Gabrielle.Muhammad@novotech-cro.com)
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-  Document emailed to Fatihah Shafie (fatihah.shafie@novotech-cro.com) for signature
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-  Fatihah Shafie (fatihah.shafie@novotech-cro.com) verified identity with Adobe Acrobat Sign authentication
2022-11-15 - 3:48:52 AM GMT
-  Fatihah Shafie (fatihah.shafie@novotech-cro.com) has agreed to the terms of use and to do business electronically with Novotech (Australia) Pty Ltd
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-  Veronica Holloway (veronica.holloway@novotech-cro.com) has agreed to the terms of use and to do business electronically with Novotech (Australia) Pty Ltd
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Signing reason: I have reviewed

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 Kim Wong (kim.wong@novotech-cro.com) verified identity with Adobe Acrobat Sign authentication

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Signing reason: I have reviewed

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 Agreement completed.

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